

We, Japan Airlines are operating an International and domestic fleet of Boeing 747, 767, 777, DC10 and MD11 airplanes.

And this Aging Airplane Safety interim final rule will affect our fleets by the our civil aviation regulatory authority.

After review of this interim final rule with background, related comments, explanation, we are still confusing and concerning to satisfy this requirements. Biggest concern is industry's (regulatory authorities, manufacturers and operators) teamwork, coordination and will.

We do not have clear picture "How this interim final rule will harmonize with existing aging airplane program".

And also definitions of "major" repair or modification, STC work and undue burden may concern.

Of course our goal is safety, therefore we strongly would like request FAA to work with industries to find out the best way to incorporate this requirements.